

# TERRENI

## LAW FIRM, LLC

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December 15, 2020

The Honorable Jocelyn G. Boyd  
Chief Clerk and Administrator  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, South Carolina 29210

Re: Docket No. 2072-275-S. Application of Condor Environmental, Incorporated  
Requesting an Expansion of Its Existing Sewer Service Areas to Include Certain Portions of  
Anderson County and Saluda County, and Approval of Agreements, (Request for Expedited  
Review)

Dear Ms. Boyd:

Condor Environmental, Inc. offers brief initial comments on the Report of the Office of  
Regulatory Staff filed December 14, 2020.

- Condor has removed the confidential designation of its response to the bill statement review. A public version is included with this letter.
- ORS states Condor has not provided a complete response to ORS AIR 1 issued in Docket No. 2020-192-S. Because Condor withdrew its application in that docket, that discovery request was no longer in effect. Condor withdrew its application, largely, to avoid the cost of burdensome discovery prompted by its originally proposed rate structure.
- ORS's First and Continuing Request for Books, Records, and Other information, served on December 11, 2020, is very broad, and seemingly more appropriate for a rate case. Condor will respond to ORS's requests appropriately, but the expansive nature of the agency's inquiry only reinforces the need to grant Condor's motion to provide service on a conditional basis.

With best wishes, I am,

Sincerely yours,

*s/ Charlie Terreni*

Charles L.A. Terreni

Enclosures (1)

c: Mr. Brad Weaver  
Counsel of Record